



American Electric Power
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AEP.com

March 7, 2014

Ron Jordan
Engineering and Analysis Division (4303T)
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Re: Follow up to Comments on Proposed Steam Electric Effluent Guidelines
AEP Mountaineer Plant (EPA Plant Survey ID - 04543; FGD-1)
Contains "Confidential Business Information"**

Dear Mr. Jordan:

In response to the EPA data request of February 6, 2014, American Electric Power (AEP) is providing flue gas desulfurization (FGD) waste water characterization and treatment performance data for the AEP Mountaineer Plant. This includes the following information:

1. Metal and inorganic concentration data for the FGD and leachate treatment system during the period January 2012 through December 2013 from the following sample points (attachment: AEP- Mountaineer Analytical Data Table):
 - FGD wastewater influent to the chemical precipitation treatment system;
 - FGD wastewater effluent from the chemical precipitation treatment system (prior to commingling with leachate);
 - Leachate waste stream prior to commingling with FGD wastewater and upstream of the biological treatment system;
 - Combined FGD and leachate wastewater upstream of the biological treatment system; and
 - Combined FGD and leachate wastewater effluent from the biological treatment system.
2. AEP began operating the biological treatment system on November 10, 2011.
3. The organosulfide additive, Metclear MR2405 from GE Betz, was primarily used in the FGD chemical precipitation wastewater treatment system for the specified time period

- (MSDS attached). However, due to supply problems, a different organosulfide product, Metclear MR2416, was used during January and February of 2012 (MSDS attached).
4. Specifications used to determine appropriate coals for use at the plant have been provided (see attached specifications and related explanation).
 5. The type and source of coal used at the plant. Sulfur and chlorine content of the coal used at the plant as available, as well as coal blend information (attachment: AEP-SE04298A1_Data Request Spreadsheet_Mountaineer).
 6. Available information on the chloride concentration, pH, and average daily ORP values for the following sampling locations, are provided:
 - Within the FGD scrubber system;
 - For the influent to the FGD chemical precipitation wastewater treatment system; and
 - For the influent to the FGD/leachate biological wastewater treatment system.
 7. Electric generation output (MW-hr) for the generating unit is also provided (attachment: AEP-SE04298A1_Data Request Spreadsheet_Mountaineer).

Please note that it was not possible to provide selected information for the following categories:

1. Daily coal source information - This information is not collected on a daily basis. Coal is moved from rail cars or barges to the coal pile or directly into the boiler, subsequently, specific information on exactly when and what coal went to the boiler is not available. Coal chlorine content information is only available on a contract basis or by request. Coal sulfur content information that is available for the requested time period has been provided (attachment: AEP-SE04298A1_Data Request Spreadsheet_Mountaineer).
2. FGD scrubber system (FGD -1) - There are gaps in the average daily chloride concentration record due to weekends, holidays and outages, when the requested information was not collected. Average daily ORP information was not recorded until monitoring instruments were installed during October 2012.
3. FGD wastewater treatment system – The average daily influent chloride concentration and ORP data were not recorded. Average daily pH information has been provided.
4. FGD biological wastewater treatment system – Gaps in the daily chloride concentration record are due to weekends, holidays and outages, when the requested information is not collected.

AEP is also providing the requested supplemental information, including:

- A list of the chemicals and dosages added to the treatment system, including the location of injection points (see attached flow diagram);
- A process flow diagram of the sampled system (attached); and
- Laboratory reports associated with the sampling data (will be delivered on a CD).

Please note that in accordance with the requirements of 40 CFR §2.203, AEP is asserting a claim of business confidentiality with respect to certain of the requested information. AEP has indicated on the face of individual documents, through the use of a legend or stamp including the word "Confidential" that the document contains confidential business information entitled to protection under 40 CFR Part 2. The information generally contains operational detail, vendor information or other information that, if disclosed publicly, would harm the competitive position of the AEP companies in the electricity markets. We ask that EPA treat the marked information in accordance with the requirements of 40 CFR Part 2. AEP considers the coal specification and sulfur data, all organosulfide and treatment chemical vendors, and the flow diagram, with all chemical injection locations and treatment dosages to be confidential business information (CBI).

If you have any questions regarding the data submittal, please contact me at 614-716-1255 or at twlohner@aep.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Lohner".

Timothy W. Lohner, Ph.D.
Environmental Services

Enclosure: Laboratory Reports on CD

Attachments: Completed AEP Mountaineer Analytical Data Table (w/e-version only)
AEP Mountaineer Coal Specifications
Completed AEP-SE04298A1_Data Request Spreadsheet_Mountaineer (w/e-version only)
MSDS – Metclear MR2405
MSDS – Metclear MR2416
Mountaineer FGD wastewater treatment flow diagrams